

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

MEETRIX IP, LLC,

Plaintiff,

v.

ZOHO CORPORATION,

Defendant.

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CASE NO. 6:21-cv-01288-ADA

JURY TRIAL DEMANDED

CASE READINESS STATUS REPORT

Plaintiff Meetrix IP, LLC (“Plaintiff”) and Defendant Zoho Corporation (“Defendant”) hereby provide the following status report.

SCHEDULE

A scheduling order has not yet been filed. A Markman date has not yet been proposed. A trial date has not yet been proposed.

FILING AND EXTENSIONS

Plaintiff’s Complaint was filed on December 10, 2021 and Defendant’s deadline to respond to the Complaint was March 8, 2022. Defendant did not seek an extension to answer.

RESPONSE TO THE COMPLAINT

On March 8, 2022, Defendant responded to Plaintiff’s Complaint by filing a Motion to Dismiss for Failure to State a Claim (“Motion to Dismiss”) (Dkt. 11).

PENDING MOTIONS

Defendant’s Motion to Dismiss for Failure to State a Claim (Dkt. 11) and Defendant’s Opposed Motion to Transfer Venue Within this District (Dkt. 13) are the only two pending

motions. Plaintiff intends to seek venue discovery from Defendant regarding the issues raised in the Motion to Transfer.

RELATED CASES IN THIS JUDICIAL DISTRICT

There is one related case in this Judicial District involving the same asserted patents: *Meetrix IP, LLC v. Verizon Communications, Inc.*, Case No. 6:21-cv-01289-ADA.

IPR, CBM, AND OTHER PGR FILINGS

There are no known IPR, CBM or other PGR filings.

NUMBER OF ASSERTED PATENTS AND CLAIMS

Plaintiff has asserted four patents and a total of 79 claims. The asserted patents are U.S. Patent No. 8,339,997, U.S. Patent No. 9,094,525, U.S. Patent No. 9,253,332, and U.S. Patent No. 9,843,612.

APPOINTMENT OF TECHNICAL ADVISOR

The parties do not believe a technical advisor is necessary.

MEET AND CONFER STATUS

The parties met and conferred on Friday, March 11, 2022. Plaintiff has no pre-*Markman* issues. Defendant has identified the following pre-*Markman* issues to raise at the CMC:

- 1) Defendant's Motion to Dismiss for Failure to State a Claim (Dkt. 11)
- 2) Defendant's Opposed Motion to Transfer Venue Within this District (Dkt. 13)

Dated: March 15, 2022

By: /s/ John D. Saba

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COUNSEL FOR PLAINTIFF

Respectfully submitted,

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Ryan J. Marton (*pro hac vice* pending)

Hector J. Ribera (*pro hac vice* to be filed)

Carolyn Chang (*pro hac vice* pending)

Phillip Haack (*pro hac vice* pending)

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ John D. Saba, Jr.
John D. Saba, Jr.